

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SARAH PALIN, an individual

Plaintiff,

v.

THE NEW YORK TIMES COMPANY,
A New York corporation, and
JAMES BENNET, an individual

Defendants.

Case No. 1:17-cv-04853-JSR

**DECLARATION OF THOMAS S.
LEATHERBURY PURSUANT
TO LOCAL RULE 1.4**

I, Thomas S. Leatherbury, Esq., respectfully submit this Declaration pursuant to Local Civil Rule 1.4, in support of the motion to withdraw of Thomas S. Leatherbury and Vinson & Elkins LLP as co-counsel for the Defendant The New York Times Company in the above-captioned matter.

1. I have personal knowledge of the facts stated herein.
2. My law firm and I have been co-counsel for Defendant The New York Times Company since the case was filed.
3. Defendant The New York Times Company is also currently being represented by Lee Levine, David A. Schulz, and Jay Ward Brown of Ballard Spahr, all of whom will be continuing as attorneys for Defendant The New York Times Company.
4. Remaining defense counsel is positioned to proceed efficiently without my continued participation or the continued participation of Vinson & Elkins LLP as counsel of record.

5. The case is currently set for trial on June 22, 2020, and this motion to withdraw will not delay the case in any way.
6. The New York Times Company has approved of this motion to withdraw, and will be served with a copy of all of these motion papers.
7. Neither I nor my firm is asserting a retaining or charging lien.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 3, 2020
Dallas, TX

Thomas S. Leatherbury

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of January 2020, I caused the foregoing

DECLARATION OF THOMAS S. LEATHERBURY PURSUANT TO LOCAL RULE 1.4

to be served via ECF or email on the following counsel of record and on the client:

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